

REMARKS

The present application was filed on December 29, 2000 with claims 1-29. Claims 1-3, 5-7, 16-18, 20-22, 30 and 31 are pending. Claims 4, 8-15, 19 and 23-29 have been canceled. Claims 1 and 16 have been amended and are the pending independent claims.

In the outstanding Office Action dated October 20, 2005, the Examiner: (i) rejected claims 1-3, 5, 6, 16-18, 20, 21, 30 and 31 under 35 U.S.C. §103(a) as being unpatentable over B. Venners, “Java’s Garbage-Collected Heap: An Introduction to the Garbage-Collected Heap of the Java Virtual Machine,” (hereinafter “Venners”) in view of U.S. Patent No. 6,638,314 to Meyerzon et al. (hereinafter “Meyerzon”); and (ii) rejected claims 7 and 22 under 35 U.S.C. §103(a) as being unpatentable over Venners in view of Meyerzon and U.S. Patent No. 5,803,078 to Hug et al. (hereinafter “Hug”).

In response to the Office Action, claims 4, 8-15, 19 and 23-29 have been canceled without prejudice, and claims 1 and 16 have been amended to more clearly recite the present invention.

With regard to the rejection of claims 1-3, 5, 6, 16-18, 20, 21, 30 and 31 under 35 U.S.C. §103(a) as being unpatentable over Venners in view of Meyerzon, Applicant respectfully asserts that the cited combination fails to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), as specified in M.P.E.P. §2143.

As set forth therein, M.P.E.P. §2143 states that three requirements must be met to establish a *prima facie* case of obviousness. First, there must be some suggestion or motivation to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited combination must teach or suggest all the claim limitations. While Applicant respectfully believes that none of the requirements have been met, it is sufficient to show that a *prima facie* case of obviousness has not been established by showing that one of the requirements has not been met.

The collective teaching of Venners and Meyerzon fails to suggest or render obvious at least the elements of independent claims 1 and 16 of the present invention. For at least this reason, a *prima facie* case of obviousness has not been established.

Independent claims 1 and 16, as amended, recite techniques for managing target documents referred to by referring documents. One or more referring documents in a network are identified.

Each of the one or more referring documents are associated with a user on the network and has one or more hypertext links. Each hypertext link points to a target document stored in a storage. It is determined when a user deletes one or more referring documents associated with the user. When one or more hypertext links pointing to a target document cease to exist, the target document is enabled to be removed from storage. Support for the amendments to claims 1 and 16 can be found on page 3, lines 1-7, of the Specification.

The combination of Vanners and Meyerzon fails to disclose the elements of identifying referring documents in a network, where each of the referring documents is associated with user of the network, as well as detecting user deletion of a reference document associated with that user. Vanners discloses garbage detection algorithms for Java objects and fails to disclose anything regarding documents in a network associated with users on the network. Meyerzon discloses document retrieval through a web crawl and fails to remedy the deficiencies described above with regard to Vanners. Therefore, the combination of Vanners and Meyerzon fails to disclose the above-mentioned elements of the independent claims.

Dependent claims 2, 3, 5, 6, 17, 18, 20, 21, 30 and 31 are patentable at least by virtue of their dependency from independent claims 1 and 16, and also recite patentable subject matter in their own right. Accordingly, withdrawal of the rejection to claims 1-3, 5, 6, 16-18, 20, 21, 30 and 31 under 35 U.S.C. §103(a) is therefore respectfully requested.

With regard to the rejection of claims 7 and 22 under 35 U.S.C. §103(a) as being unpatentable over Vanners in view of Meyerzon and Hug, Applicant asserts that such claims are patentable at least by virtue of their dependency from respective independent claims 1 and 16. Further, one or more of dependent claims 7 and 22 contain patentable subject matter in their own right. Accordingly, withdrawal of the rejection of claims 7 and 22 under 35 U.S.C. §103(a) is therefore respectfully requested.

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In view of the above, Applicant believes that claims 1-3, 5-7, 16-18, 20-22, 30 and 31 are in condition for allowance, and respectfully requests withdrawal of the §103(a) rejections.

Respectfully submitted,



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